

EXHIBIT L

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7 Attorneys for Defendants, COUNTY OF SAN BERNARDINO,
ROBERT VACCARI, AND JAKE ADAMS

8 **UNITED STATES DISTRICT COURT**

9 **CENTRAL DISTRICT OF CALIFORNIA**

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11 L.C., a minor by and through her
12 guardian *ad litem* Maria Cadena,
individually and as successor-in-interest
13 to Hector Puga; I.H., a minor by and
through his guardian *ad litem* Jasmine
14 Hernandez, individually and as
successor-in-interest to Hector Puga;
15 A.L., a minor by and through her
guardian *ad litem* Lydia Lopez,
16 individually and as successor-in-interest
to Hector Puga; and ANTONIA
17 SALAS UBALDO, individually,

18 Plaintiffs,

19 vs.

20 STATE OF CALIFORNIA; COUNTY
OF SAN BERNARDINO; S.S.C., a
21 nominal defendant; ISAAH KEE;
MICHAEL BLACKWOOD;
22 BERNARDO RUBALCAVA;
ROBERT VACCARI; JAKE ADAMS;
23 and DOES 6-10, inclusive,

24 Defendants.

CASE NO. 5:22-cv-00949-KK-(SHKx)

*Assigned for All Purposes to:
Hon. Kenly K. Kato – Courtroom 1*

**DEFENDANT ROBERT VACCARI'S
INTERROGATORIES, SET ONE, TO
PLAINTIFF L.C., A MINOR BY AND
THROUGH HER GUARDIAN AD
LITEM, MARIA CADENA,
INDIVIDUALLY**

Trial Date: 06/02/2025

Complaint filed: 06/07/2022

FAC filed: 10/18/2022

SAC filed: 1/13/2023

TAC filed: 5/12/2023

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1 **PROPOUNDING PARTY:** DEFENDANT ROBERT VACCARI
2 **RESPONDING PARTY:** PLAINTIFF L.C., A MINOR BY AND THROUGH
3 HER GUARDIAN AD LITEM, MARIA CADENA,
4 Individually
5 **SET NO.:** ONE (1)

6 Pursuant to Federal Rules of Civil Procedure, Rule 33, Defendant ROBERT
7 VACCARI (“Defendant”) hereby propound his First Set of Interrogatories on
8 Plaintiff L.C., A MINOR BY AND THROUGH HER GUARDIAN AD LITEM,
9 MARIA CADENA, Individually (hereinafter “Plaintiff”).

10 **PRELIMINARY STATEMENT AND GENERAL INSTRUCTIONS**

11 A. In answering these interrogatories, you are required to furnish all
12 information that is available to you, including information in the possession of your
13 attorney(s), or other persons directly or indirectly employed by you, or connected
14 with you or your attorney(s), or your insurance carrier, and anyone else acting on
15 your behalf or otherwise subject to your control.

16 B. In answering these interrogatories, you must make a diligent search of
17 your records and material in your possession or available to you or your
18 representatives. If you cannot obtain records and information in time to answer
19 these interrogatories, explain in your answer the circumstances and what is being
20 done to obtain the information.

21 C. If you cannot answer any interrogatory in full, answer it to the
22 extent possible, explain why you cannot answer the remainder, and state the
23 nature of the information or knowledge you cannot furnish.

24 D. If an interrogatory calls for a description of a document,
25 photograph, or other writing or thing, describe it in sufficient detail that it can be
26 obtained from you by a motion for production or a subpoena. If you prefer,

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1 instead of describing it, simply attach to your answer a clear copy or photograph
2 of the writing or thing.

3 E. If your answer to any interrogatory is derived from a document or
4 writing, describe the writing or attach a copy as indicated above.

5 F. Whenever the term "INCIDENT" is used in an interrogatory, it
6 refers to the incident(s) which gave rise to your lawsuit.

7 G. Whenever the term "IDENTIFY" is used in an interrogatory when in
8 reference to a person, it means to provide the last known name, address, and
9 telephone number of the person or entity to which it pertains; "IDENTIFY" when in
10 reference to a document, means to state the type of document, the person who
11 prepared the document, the date on which the document was prepared, and a
12 description of its subject matter.

13 H. "DOCUMENT" or "DOCUMENTS" refers to each and every
14 printed, written, typewritten, graphic, photographic, electronically or sound
15 recorded matter, however produced or reproduced, of every kind and description,
16 including but not limited to, memoranda, telegrams, papers, notes, invoices, bids,
17 estimates, purchase orders, diagrams, plans, specifications, journals,
18 correspondence, photographs, videotapes, whether the original or any carbon or
19 photographic or other copy, reproduction, or facsimile thereof.

20 I. "PLAINTIFF," "YOU," or "YOUR" means Plaintiff L.C., A
21 MINOR BY AND THROUGH HER GUARDIAN AD LITEM, MARIA
22 CADENA, Individually ("Plaintiff").

23 J. "DECEDENT" means HECTOR PUGA.

24 K. "DEFENDANT" means Defendant ROBERT VACCARI.

25 L. "COUNTY" means Defendant County of San Bernardino.

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INTERROGATORIES, SET ONE

INTERROGATORY NO. 1:

IDENTIFY by name and provide contact information for the person that captured the video footage Plaintiff provided on October 31, 2024, identified by Plaintiff as Bates No. 0241, in response to County's Request for Production of Documents, Set One.

INTERROGATORY NO. 2:

IDENTIFY the type of recording device (such as cell phone, iPad, etc) and the make and model of the recording device used to capture Plaintiff's Bates No. 0241 video produced on October 31, 2024, in response to County's Request for Production of Documents, Set One.

INTERROGATORY NO. 3:

IDENTIFY by name and provide contact information for, any and all individuals known to be present when Plaintiff's Bates No. 0241 video, provided on October 31, 2024, in response to County's Request for Production of Documents, Set One, was captured.

INTERROGATORY NO. 4:

State the specific location, including the address, of where Plaintiff's Bates No. 0241 video, provided on October 31, 2024, in response to County's Request for Production of Documents, Set One, was taken from.

INTERROGATORY NO. 5:

State whether Plaintiff's Bates No. 0241 video, provided on October 31, 2024, in response to County's Request for Production of Documents, Set One, was taken, from inside or outside, and if from inside, identify where inside the video was taken from.

INTERROGATORY NO. 6:

State whether Plaintiff's Bates No. 0241 video, provided on October 31,

2024, in response to County's Request for Production of Documents, Set One, was taken through a window or glass.

INTERROGATORY NO. 7:

State whether Plaintiff's Bates No. 0241 video, provided on October 31, 2024, in response to County's Request for Production of Documents, Set One, is the entire video captured.

INTERROGATORY NO. 8:

State whether Plaintiff's Bates No. 0241 video, provided on October 31, 2024, in response to County's Request for Production of Documents, Set One, has been altered, enhanced, and/or modified in any way.

INTERROGATORY NO. 9:

State whether Plaintiff's Bates No. 0241 video, provided on October 31, 2024, in response to County's Request for Production of Documents, Set One, is the original version of the video or if there are other versions that exist.

INTERROGATORY NO. 10:

State whether Plaintiff is aware of any other video or audio recording capturing the incident and if so, IDENTIFY all known video and audio not yet provided to Defendants.

DATED: November 8, 2024

LYNBERG & WATKINS
A Professional Corporation

By: /s/ Amy R. Margolies

SHANNON L. GUSTAFSON

AMY R. MARGOLIES

Attorneys for Defendants,
COUNTY OF SAN BERNARDINO,
ROBERT VACCARI, AND JAKE
ADAMS

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 1100 Town & Country Road, Suite #1450, Orange, California 92868.

On November 8, 2024, I served the foregoing document(s) described as **DEFENDANT ROBERT VACCARI'S INTERROGATORIES, SET ONE TO PLAINTIFF L.C. INDIVIDUALLY** on the interested parties by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

REFER TO ATTACHED SERVICE LIST

- ☐ **BY MAIL:** As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, I deposited such envelope in the mail at Orange, California.
- ☐ **VIA ELECTRONIC MAIL (CM/ECF)** - all parties listed above have been served via electronic mail through the court's CM/ECF system, which automatically generates a Notice of Electronic Filing (NEF) allowing registered e-filers to retrieve the document.
- ☐ **BY FEDERAL EXPRESS/OVERNIGHT MAIL:** I caused the above-described document to be served on the interested parties noted as follows by Federal Express/Overnight Mail.
- ☒ **BY ELECTRONIC MAIL:** I caused all of the pages of the above-entitled document to be sent to the recipient(s) noted at the respective email address(es) indicated.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made. I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on November 8, 2024, at Orange, California.

/s/ Gloria Pence
Gloria Pence

SERVICE LIST

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Hang D. Le, Esq. L.C., I.H., A.L., and
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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

L.C., a minor by and through her guardian
ad litem Maria Cadena, individually and as
successor-in-interest to Hector Puga; I.H., a
minor by and through his guardian ad litem
Jasmine Hernandez, individually and as
successor-in-interest to Hector Puga; A.L.,
a minor by and through her guardian ad
litem Lydia Lopez, individually and as
successor-in-interest to Hector Puga; and
ANTONIA SALAS UBALDO,
individually

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY OF
SAN BERNARDINO; S.S.C., a nominal
defendant; ISAAH KEE; MICHAEL
BLACKWOOD; BERNARDO
RUBALCAVA; ROBERT VACCARI;
JAKE ADAMS; and DOES 6-10, inclusive,

Defendants.

Case No.: 5:22-cv-00949-JGB-(KK)

**PLAINTIFF L.C. RESPONSES TO
DEFENDANT ROBERT
VACCARI'S INTERROGATORIES
(SET ONE)**

PROPOUNDING PARTY: Defendant, Robert Vaccari

RESPONDING PARTY: Plaintiff, L.C., a minor by and through her GAL, Maria
Cadena

SET NUMBER: One (1)

TO PROPOUNDING PARTY AND THE ATTORNEY(S) OF RECORD:

Plaintiff has not fully completed an investigation of the facts relating to this case, has not fully completed discovery in this action and has not completed trial preparation. All of the answers contained herein are based only upon such information and documents which are presently available to, and specifically known to this responding party and disclose only those contentions which presently occur to such responding party.

It is anticipated that further discovery, independent investigation, legal research and analysis will supply additional facts, add meaning to the known facts, as well as establish entirely new factual conclusions and legal contentions, all of which may lead to substantial additions to, changes in, and variations from the contentions herein set forth. The following interrogatory responses are given without prejudice to responding party's right to produce evidence of any subsequently discovered fact or facts which this responding party may later recall. Plaintiff accordingly reserves the right to change any and all answers herein as additional facts are ascertained, analyses are made, legal research is completed, and contentions are fashioned. The answers contained herein are made in a good faith effort to supply as much factual information and as much specification of legal contentions as is presently known by this responding party and should in no way be construed so as to preclude, or foreclose further discovery, research or analysis by said party.

The following general objections are made to each and every interrogatory and are deemed to be incorporated into the specific objection and response provided to each interrogatory:

Each of the following General Objections is incorporated as an objection to each interrogatory herein whether or not specific reference is made thereto:

1 1. Plaintiff objects on the grounds that Plaintiff has not completed the factual
2 investigation. These responses are made in good faith and after diligent inquiry into the
3 facts and information now known to Plaintiff as well as the present analysis of the case.
4 However, information that may be responsive to the Interrogatories may not yet have
5 been discovered. Accordingly, without asserting an obligation to do so, and without
6 waiving the objections asserted herein, Plaintiff reserve

7 2. es the right to amend and/or supplement these responses as and when
8 additional information is discovered. Additionally, because Plaintiff's responses are
9 based upon information that Plaintiff recalls and has identified to date, it does not
10 preclude Plaintiff from relying on facts or documents recalled, discovered or generated
11 pursuant to subsequent investigation and discovery.

12 3. Plaintiff objects to the Interrogatories to the extent that they seek irrelevant
13 information and information that is not reasonably calculated to lead to the discovery of
14 admissible evidence.

15 4. Plaintiff objects to the Interrogatories to the extent that they are over-broad,
16 vague, ambiguous, and unduly burdensome.

17 5. Plaintiff objects to the Interrogatories to the extent that they are vague and
18 ambiguous and phrased so as to require Plaintiff to speculate concerning the meaning
19 intended by Defendant.

20 6. Plaintiff objects to the Interrogatories to the extent that they call for
21 information protected from discovery by the attorney-client privilege, the attorney
22 work-product doctrine and/or other applicable privileges and protections.

23 7. Inadvertent disclosure of such information shall not constitute a waiver of
24 any privilege or ground for objecting to disclosing such information and shall not waive
25 Plaintiff's right to object to the use of such information.

26 8. Plaintiff objects to the Interrogatories to the extent that they seek
27 information that infringes upon the privacy rights of Plaintiff or third parties.
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1 9. Plaintiffs object to the Interrogatories to the extent that they seek
2 information already known by, or reasonably accessible to Defendants, or facts that are
3 solely within the knowledge and control of Defendants.

4 10. Plaintiff's objections to the disclosure of any information requested in the
5 Interrogatories are not and shall not be construed as an admission that any such
6 information exists.

7 **RESPONSES TO INTERROGATORIES (SET ONE)**

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9 **INTERROGATORY 1:**

10 IDENTIFY by name and provide contact information for the person that captured
11 the video footage Plaintiff provided on October 31, 2024, identified by Plaintiff as Bates
12 No. 0241, in response to County's Request for Production of Documents, Set One.

13 **RESPONSE TO INTERROGATORY 1:**

14 Plaintiff does not have personal knowledge of the information requested in this
15 Interrogatory. After diligent search and reasonable inquiry, Plaintiff is informed of and
16 thereon believes the name and contact information of the person who captured the video
17 footage Plaintiff provided on October 31, 2024, identified by Plaintiff as Bates No. 0214
18 is as follows: Betzabeth Gonzalez, Phone: 760-985-6970.

19 **INTERROGATORY 2:**

20 IDENTIFY the type of recording device (such as cell phone, iPad, etc) and the
21 make and model of the recording device used to capture Plaintiff's Bates No. 0241
22 video produced on October 31, 2024, in response to County's Request for Production of
23 Documents, Set One.

24 **RESPONSE TO INTERROGATORY 2:**

25 Plaintiff does not have personal knowledge of the information requested in this
26 Interrogatory. After diligent search and reasonable inquiry, Plaintiff is informed of and
27 thereon believes that the video was captured on a Samsung Galaxy cell phone.

1 **INTERROGATORY 3:**

2 Plaintiff does not have personal knowledge of the information requested in this
3 Interrogatory. After diligent search and reasonable inquiry, Plaintiff is informed of and
4 thereon believes that the video was captured on a Samsung Galaxy cell phone.

5 **RESPONSES TO INTERROGATORY 3:**

6 Plaintiff does not have personal knowledge of the information requested in this
7 Interrogatory. After diligent search and reasonable inquiry, Plaintiff is informed of and
8 thereon believes that an individual by the name of Jacob Gonzalez was also present
9 when Bates No. 0241 was recorded and that his contact information is (619) 631-2526.

10 **INTERROGATORY 4:**

11 State the specific location, including the address, of where Plaintiff's Bates No.
12 0241 video, provided on October 31, 2024, in response to County's Request for
13 Production of Documents, Set One, was taken from.

14 **RESPONSES TO INTERROGATORY 4:**

15 Plaintiff does not have personal knowledge of the information requested in this
16 Interrogatory. After diligent search and reasonable inquiry, Plaintiff is informed of and
17 thereon believes that the video was taken at the following address: 11428 Peach
18 Avenue, Hesperia CA 92345.

19 **INTERROGATORY 5:**

20 State whether Plaintiff's Bates No. 0241 video, provided on October 31, 2024, in
21 response to County's Request for Production of Documents, Set One, was taken, from
22 inside or outside, and if from inside, identify where inside the video was taken from.

23 **RESPONSES TO INTERROGATORY 5:**

24 Plaintiff does not have personal knowledge of the information requested in this
25 Interrogatory. After diligent search and reasonable inquiry, Plaintiff is informed of and
26 thereon believes that the video was taken indoors, inside a bathroom.

INTERROGATORY 6:

State whether Plaintiff's Bates No. 0241 video, provided on October 31, 2024, in response to County's Request for Production of Documents, Set One, was taken through a window or glass.

RESPONSES TO INTERROGATORY 6:

Plaintiff does not have personal knowledge of the information requested in this Interrogatory. After diligent search and reasonable inquiry, Plaintiff is informed of and thereon believes that the video was recorded behind a screen.

INTERROGATORY 7:

State whether Plaintiff's Bates No. 0241 video, provided on October 31, 2024, in response to County's Request for Production of Documents, Set One, is the entire video captured.

RESPONSES TO INTERROGATORY 7:

Plaintiff does not have personal knowledge of the information requested in this Interrogatory. After diligent search and reasonable inquiry, Plaintiff is informed of and thereon believes that Bates No. 0241 is the full video

INTERROGATORY 8:

State whether Plaintiff's Bates No. 0241 video, provided on October 31, 2024, in response to County's Request for Production of Documents, Set One, has been altered, enhanced, and/or modified in any way.

RESPONSES TO INTERROGATORY 8:

Plaintiff does not have personal knowledge of the information requested in this Interrogatory. After diligent search and reasonable inquiry, Plaintiff is informed of and thereon believes that Bates No. 0241 has not been altered, enhanced, or modified in any way.

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INTERROGATORY 9:

State whether Plaintiff's Bates No. 0241 video, provided on October 31, 2024, in response to County's Request for Production of Documents, Set One, is the original version of the video or if there are other versions that exist.

RESPONSES TO INTERROGATORY 9:

Plaintiff does not have personal knowledge of the information requested in this Interrogatory. After diligent search and reasonable inquiry, Plaintiff is informed of and thereon believes that Bates No. 0241 is the original video.

INTERROGATORY 10:

State whether Plaintiff is aware of any other video or audio recording capturing the incident and if so, IDENTIFY all known video and audio not yet provided to Defendants.

RESPONSES TO INTERROGATORY 10:

Plaintiff does not have personal knowledge of the information requested in this Interrogatory. After diligent search and reasonable inquiry, Plaintiff is informed of and thereon believes that that there are three additional videos of the incident that were taken by Betzabeth Gonzalez.

DATED: December 4, 2024

THE LAW OFFICES OF DALE K. GALIPO

BY: /s/ Hang D. Le

Dale K. Galipo

Hang D. Le

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA	FOR COURT USE ONLY
TITLE OF CASE (Abbreviated) L.C., et al. v. State of California, et al.	
ATTORNEY(S) NAME AND ADDRESS Dale K. Galipo (CA SBN 144074) Hang D. Le, Esq. (Bar No. 293450) LAW OFFICES OF DALE K. GALIPO 21800 Burbank Blvd, Suite 310 Woodland Hills, California 91367 Fax: (818) 347-4118 Email: dalekgalipo@yahoo.com ; hlee@galipolaw.com	
ATTORNEY(S) FOR: Plaintiffs	Case No. 5:22-cv-00949-JGB-KK Courtroom: 1 Judge: Jesus G Bernal

DECLARATION OF SERVICE

I, Leslie De Leon, am employed in the County of Los Angeles, State of California and am over the age of eighteen years and not a party to the within action. My business address is 21800 Burbank Boulevard, Suite 310, Woodland Hills, California 91367. On December 9, 2024, I served the foregoing document described as: **PLAINTIFF L.C. RESPONSES TO DEFENDANT ROBERT VACCARI'S INTERROGATORIES (SET ONE)** on all interested parties, through their respective attorneys of record in this action by placing a true copy thereof enclosed in a sealed envelope addressed as specified below:

SEE ATTACHED SERVICE LIST

METHOD OF SERVICE

☐ (BY MAIL) I enclosed the documents in a sealed envelope or package and addressed to the parties at the address specified above.

☐ I placed the envelope or package for collection and mailing, following our ordinary business practices. I am readily familiar with the practice of this office for the collection, processing and mailing of documents. On the same day that documents are placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

☒ (BY ELECTRONIC SERVICE) I caused the foregoing document(s) to be sent via electronic transmittal to the notification addresses listed below as registered with this court's case management/electronic court filing system.

I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on December 9, 2024

/s/ *Leslie De Leon*

Leslie De Leon

SERVICE LIST

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